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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH Individually and as)
Parent and Legal Guardian of W.W., K.W., G.W.,)
and L.W., minor children and MATTHEW)
WADSWORTH,) Case No. 2:23-cv-00118-KHR
Plaintiffs,)
DEFENDANTS' MOTION TO
EXCLUDE EFFORTS TO
AMEND COMPLAINT AND
ADD LOSS OF
CONSORTIUM CLAIMS FOR
MINOR PLAINTIFFS
v.)
WALMART INC. and JETSON ELECTRIC
BIKES, LLC,)
Defendants.)

Defendants Walmart, Inc. (“Walmart”) and Jetson Electric Bikes, LLC (“Jetson”), by and through their undersigned counsel, hereby ask the Court to deny or reject any efforts of Plaintiffs to amend their *Complaint* to include “loss of consortium” claims for the four minor Plaintiffs. These claims have never been pled, Plaintiffs have not timely moved to amend to add them, and allowing them to be presented to a jury at this late juncture without adequate notice of discovery would be prejudicial to Defendants.

Dated this 25th day of February, 2025.

/s/ Holly L. Tysse

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